Feedback Form

Long-Term 2 RFP – August 20, 2026

Feedback Provided by:

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Date: September 4, 2026

To promote transparency, feedback submitted will be posted on the Long-Term 2 RFP engagement page unless otherwise requested by the sender.

☐ **NO - There is confidential information, do not post**

☒ **YES - Comfortable to publish to the IESO web page**

Following the August 20th, Long-Term 2 RFP engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed. The presentation and recording can be accessed from the Long-Term Procurement engagement webpage.

Note: The IESO will accept additional materials where it may be required to support your rationale provided below. When sending additional materials, please indicate if they are confidential.

Please submit feedback to engagement@ieso.ca **by September 4, 2026.**

Repowering

Do you have feedback on the proposed requirements?

- Repowering: Requirement for Commercial Operation:

  N/A

- Repowering: Competition Mechanics:

  N/A

Federal Crown Land

Please inform the IESO if you intend to site your project on federal Crown land.

Disclosure of Additional Pricing Information for Window 1

Do you have feedback the IESO should consider when determining whether to release price curves for LT2 Window 1?

Horizon welcomes additional disclosure of pricing information related to submitted proposals. Horizon further advocates that the pricing disclosure be separated into lists for each technology within the energy stream. For example, a separate list (ranked low to high) for non-rooftop solar, rooftop solar, Wind, and Hydro. To avoid confirming the exact price of the only Hydro proposal, this detail could be excluded from the list. All other technology types had ample proposals submitted to ensure anonymity remains within sperate lists. The same approach could be used for the capacity stream, with the Biomass proposal being excluded from a specific list to avoid confirming the exact price of this technology.

General Comments/Feedback

Do you have additional feedback to share with the IESO?

- DARTA Protection Framework reduction
  - Horizon appreciates that the IESO included an 85% DARTA protection framework under the previous LT2e-1 contract, however, Horizon also believes that the necessary historical information and understanding of market dynamics are not yet present to allow for this framework to be reduced to 60%. Given the relative immaturity of the MRP coupled with the lengthy timeframe between bid submission and project operations we believe that keeping the protection framework at 85% for LT2e-2 is needed. Without

this continued protection at 85% the ability to finance the contract will be reduced while lender rates associated with financing will likely increase, resulting in higher overall bid prices. 85% coverage ensures lenders are comfortable with the risks within the contract and willing to provide contract appropriate lending rates, resulting in lower overall bid prices

- Connection Cost Provision removal

    - Horizon strongly advocates that the interim Connection Cost Provisions remain in place as part of the LT2e-2 RFP. These provisions were originally introduced as a risk-sharing mechanism to address the lack of clarity around expected interconnection costs. Horizon believes that these risks continue to exist, that nothing has changed between the first and second RFP that would warrant removing this provision, particularly where proponents do not have sufficient information or certainty regarding the costs associated with connecting a project to the transmission system.

      Without meaningful improvements to the availability and accuracy of interconnection cost estimates, removing the interim Connection Cost Provisions would transfer significant additional cost risk to proponents and could negatively impact project pricing and participation in the procurement.

      If IESO intends to remove the Connection Cost Provisions, Horizon recommends that IESO establish an alternative mechanism that provides proponents with greater certainty regarding interconnection costs prior to submitting their bids. For example, IESO could consider requiring or facilitating project-specific feasibility or connection studies as part of the procurement process, similar to approaches used in other jurisdictions (such as British Columbia).

      At a minimum, if the interim Connection Cost Provisions are removed, Horizon recommends that IESO clearly identify the alternative measures that will be implemented to provide proponents with a comparable level of certainty and risk mitigation regarding interconnection costs.

- Prime Agricultural Areas

    - Horizon strongly advocates for removing the Prime Agricultural Area requirements given that IESO has confirmed that the Municipal Support Resolution (MSR) requirement will remain for the LT2e-2 RFP. Maintaining both requirements is largely redundant, as municipal councils retain the ability to determine whether a project is appropriately sited through the MSR process, regardless of whether the project is located within a Prime Agricultural Area.

      Where a project has landowner support, appropriate commitments and mitigation measures, and has received municipal support through an MSR, the fact that it is located within a Prime Agricultural Area should not, in itself, prevent the project from proceeding.